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Attorneys for Secured Creditor

HARVEST SMALL BUSINESS FINANCE, LLC

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION

IN RE:

In re SEATON INVESTMENTS, LLC et al,

Debtor and Debtor in Possession.

- ☐ Affects All Debtors
- ☒ Affects Seaton Investments, LLC
- ☒ Affects Colyton Investments, LLC
- ☐ Affects Broadway Avenue Investments, LLC
- ☒ Affects SLA Investments, LLC
- ☒ Affects Negev Investments, LLC
- ☒ Affects Alan Gomperts
- ☐ Affects Daniel Halevy
- ☒ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos: 2:24-bk-12080-VZ; 2:24-bk-12081-VZ; 2:24-bk-12082-VZ; 2:24-bk-12091-VZ; 2:24-bk-12074-VZ; 2:24-bk-12075-VZ and 2:24-bk-12076-VZ

Chapter 11

**LIMITED OPPOSITION TO DEBTOR'S
MOTION FOR ORDER AUTHORIZING
USE OF CASH COLLATERAL AND
CONCURRENCE**

Status Conference

DATE: June 20, 2024

TIME: 11:00 a.m.

CTRM: 1368

JUDGE: Hon. Vincent Zurzolo

ADDRESS: 255 East Temple Street,
Los Angeles, CA

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1 HARVEST SMALL BUSINESS FINANCE, LLC (“Harvest”), a creditor with a claim in the
2 amount of approximately \$1,804,591.26 secured, as admitted by the Debtors, by a deed of trust on the
3 real property commonly known as 1040 S. Los Angeles Street, Los Angeles, California 90015 (APN
4 5745-020-057) hereby respectfully submits its limited opposition to the motion for use of cash
5 collateral filed by the Debtors indicated in the caption above and concurrence with the objections of
6 secured creditor ARCHWAY REAL ESTATE INCOME FUND I SPE I, LLC (“Archway”) (Docket
7 No. 99) and WELLS FARGO BANK NATIONAL WEST (“Wells Fargo”) (Docket Nos. 100 and
8 101).

9 Although Harvest does not object to the Debtors’ use of cash collateral generally, it does
10 believe that the objections made by Archway and Wells Fargo are valid and concurs that cash
11 collateral use should be authorized, but under the conditions suggested by Archway and Wells Fargo,
12 including but not limited to a more detailed budget, superpriority liens, segregation of cash collateral
13 and an accounting, etc. Harvest also shares Archway’s concern about any proposed payments to
14 Almighty Builders, Inc. to the extent that it should be employed prior to any such payments being
15 made and to any insiders before the Court has had an opportunity to review and approve budgets for
16 their specific expenses.

17 As a result of the foregoing, Harvest respectfully requests that the Court authorize the use of
18 cash collateral but only under the conditions set forth in the Archway and Wells Fargo objections that
19 are incorporated by reference herein.

20
21 Dated: June 17, 2024

HEMAR, ROUSSO & HEALD, LLP

22
23 /s/ *Jacqueline L. James*

24 _____
JACQUELINE L. JAMES

Attorneys for Secured Creditor

HARVEST SMALL BUSINESS FINANCE, LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
15910 Ventura Blvd., 12th Floor, Encino, CA 91436

A true and correct copy of the foregoing document entitled (*specify*): **LIMITED OPPOSITION TO DEBTOR'S MOTION FOR ORDER AUTHORIZING USE OF CASH COLLATERAL AND CONCURRENCE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 17, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **June 17, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 17, 2024

MARY ANN GRANZOW

MaryAnn Granzow

Date

Printed Name

Signature

SERVICE LIST

SERVED BY COURT VIA ECF:

- **Tanya Behnam** tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;ladoocketing@polsinelli.com
- **Carol Chow** Carol.Chow@saul.com, easter.santamaria@saul.com
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- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

SERVED BY PERSONAL DELIVERY:

Chambers' copy:

Hon. Vincent P. Zurzolo
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1360 / Courtroom 1368
Los Angeles, CA 90012